

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER PLADOTT,

Plaintiff

v.

LARRY EWERS,
JOHN DOES 1 – 5
JOHN DOES 6 – 10,

Defendants.

CIVIL ACTION
NO. 05-10356-RWZ

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION
AGAINST THE DEFENDANT LARRY EWERS

The Plaintiff, Alexander Pladott ("Pladott"), hereby requests this Court to enter an order restraining and enjoining the Defendant, Larry Ewers ("Ewers"), until further order of this Court, from representing to any court or third-party that he is a direct creditor of Christopher Patrick Heron, by way of a Compensation Agreement dated May 3, 2002 between E.P.D. Management Company, LLC and Howard Eugene Liner, or otherwise. In addition, Pladott requests this Court to order Ewers to serve a copy of the Preliminary Injunction upon any courts and any third parties to whom he has made any such representation.


As grounds for this Motion, Pladott states that he represents a group of Heron's true creditors, and that a significant likelihood exists that Ewers will make the representations which Pladott seeks to restrain and enjoin in an effort to recover, for the sole benefit of Ewers, assets which should rightfully be shared among Heron's actual

creditors Pladott has filed this Motion in order to maintain the status quo while the rights of the parties to the assets are fully adjudicated.

In further support of this Motion, Pladott submits a Memorandum in support of same and his Affidavit.

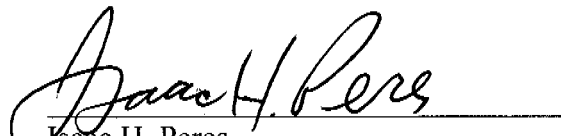
ALEXANDER PLADOTT

By his Attorney,


Isaac H. Peres, BBO #545149
50 Congress Street
Boston, MA 02109
(617) 722-0094

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2005, I served a copy of this Motion, by first class mail, upon Alan Spiro, Edwards & Angell, LLP, 101 Federal Street, Boston, MA 02110.


Isaac H. Peres